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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al.,

Consolidated Case No. 3:20-cv-08570-JD

Plaintiffs,

**DECLARATION OF CLAIRE D.
HAUSMAN IN SUPPORT OF CONSUMER
PLAINTIFFS' RENEWED MOTION TO
EXCLUDE PORTIONS OF DR. JOHN
LIST'S PROPOSED TESTIMONY**

VS

META PLATFORMS, INC.,

Defendant.

The Hon. James Donato

This Document Relates To: All Actions

1 I, Claire D. Hausman, declare:

2 1. I am of counsel at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). I
3 have been actively involved in this action, am familiar with the proceedings, and have personal
4 knowledge of the matters stated herein.

5 2. I respectfully submit this declaration in support of Consumer Plaintiffs’ Renewed
6 Motion to Exclude Portions of Dr. John List’s Proposed Testimony. Attached to this declaration are
7 true and correct copies of **Exs. 1-16**, which are documents and deposition transcripts that Consumer
8 Plaintiffs cite in their Motion. For the Court’s convenience, the relevant portions of the documents
9 and deposition transcripts have been excerpted where applicable.¹

<u>Ex. No.</u>	<u>Description of Exhibit</u>	<u>Provisionally Filed Under Seal</u>
1	Excerpts from Merits Expert Report of Facebook Expert John A. List, Ph.D.	Yes
2	Excerpts from Appendices to Merits Expert Report of Facebook Expert John A. List, Ph.D.	Yes
3	Excerpts from Deposition of Dr. John List, taken in <i>Klein v. Meta Platforms</i> on March 1, 2024	Yes
4	Excerpts from Merits Expert Rebuttal Report of Consumer Expert Joseph Farrell, D. Phil.	Yes
5	Excerpts from Merits Expert Report of Facebook Expert Dennis Carlton, Ph.D.	Yes
6	Excerpts from Deposition of Dr. Dennis Carlton, taken in <i>Klein v. Meta Platforms</i> on March 7, 2024	Yes
7	Excerpts from FTC Rebuttal Expert Report of Facebook Expert Dennis W. Carlton, Ph.D. in <i>FTC v. Meta Platforms</i> Case	Yes
8	Excerpts from Hendel, Igal, and Aviv Nevo. “Measuring the implications of sales and consumer inventory behavior.” <i>Econometrica</i> 74, no. 6 (2006).	No
9	Excerpts from 2023 Merger Guidelines from the U.S. Department of Justice and the Federal Trade Commission	No

28 ¹ Should the Court find it helpful, Consumers can submit any cited materials in full.

<u>Ex. No.</u>	<u>Description of Exhibit</u>	<u>Provisionally Filed Under Seal</u>
10	Excerpts from Facebook's January 23, 2023 Responses and Objections to Consumer Plaintiffs' Fifth Set of Requests for Production	No
11	Discovery Correspondence Between Facebook and Consumer Plaintiffs Regarding Structured Data Requests	No
12	Excerpts from <i>Antitrust in Attention Markets: Objections and Responses</i> , John M. Newman, 59 <u>Santa Clara L. Rev.</u> 743 (2020)	No
13	Excerpts from Natural Experiments, <i>Antitrust Law Developments</i> (Ninth Ed.), <u>American Bar Association</u> (2022)	No
14	Excerpts from Perloff and Carlton, <i>Industrial Organization</i> , 2d ed.	No
15	Excerpts from Besanko and Braeutigam, <i>Microeconomics</i> , 3d ed.	No
16	Excerpts from <i>Natural Experiments</i> (Ch. 31), Mary Coleman & James Langenfeld, <u>Issues in Competition Law and Policy</u> , American Bar Association (2008)	No

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 28th day of April, 2025 in Los Angeles, California.

By /s/ Claire D. Hausman

Claire D. Hausman